

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

SHAWN JOSEPH,

Plaintiff,

vs.

GENESIS COIN, INC.; GENESIS  
SERVICES, INC.; AQUARIUS  
MANAGEMENT CORP.; and EVAN  
ROSE,

Defendants.

Civil Action No. 1:22-cv-00615-JRN

**PLAINTIFF SHAWN JOSEPH'S UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO SUBMIT PROPOSED SCHEDULING ORDER**

Defendants removed this case to federal court and filed a counterclaim on June 23, 2022. Dkt. No. 1. The Court granted Plaintiff an extension of his time to respond to the counterclaim until after Plaintiff's remand motion is ruled on or the Court's jurisdiction is otherwise decided. *See* Text Order Granting Dkt. No. 15. Plaintiff then moved to remand to state court, or in the alternative, for leave to take expedited jurisdictional discovery on July 25, 2022. *See* Dkt. No. 23. Defendants' response to Plaintiff's remand motion is due by August 8, then Plaintiff's reply is due seven (7) days thereafter. *See* Text Order Granting Dkt. No. 25.

Under the Local Rules, the current deadline for the parties to submit a joint Proposed Scheduling Order is August 22, 2022. W.D. Tex. L.R. CV-16(c). The parties have conferred and agreed that, like Plaintiff's response to Defendants' counterclaim, the deadline for the submission

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of a joint Proposed Scheduling Order should be extended until after the Court has ruled on Plaintiff's pending remand motion or otherwise determined its jurisdiction.

As such, Plaintiff respectfully requests that the Court enter the attached Proposed Order extending the parties' time to file a joint Proposed Scheduling Order until twenty-one (21) days before the date of any scheduling conference set after the Court has ruled on Plaintiff's pending remand motion. This motion is unopposed.

DATED: August 1, 2022

By: /s/ William M. Odom

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 1st day of August, 2022, I electronically filed the foregoing and attachments with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following counsel of record for Defendants:

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